

**IN THE UNITED STATES BANKRUPTCY COURT
OF THE EASTERN DISTRICT OF PENNSYLVANIA**

In Re:	:	
Harry M. Scignoli	:	Chapter 13
	:	Case No.: 18-18285-AMC
Debtor(s)	:	
	:	

MOTION TO APPROVE LOAN MODIFICATION

Debtor, Harry M. Scignoli, by and through Attorney Brad J. Sadek, moves this Honorable Court for an Order approving a loan modification with LoanCare, LLC on the property located at 309 Crescent Hill Drive Havertown, PA 19083 and hereby avers the following:

1. Debtor filed a Voluntary Petition for relief under Chapter 13 of the Bankruptcy Code on December 18, 2018.
2. LoanCare, LLC, the Mortgagee, has agreed to a mortgage loan modification on the debtor's property located at 309 Crescent Hill Drive Havertown, PA 19083 as the debtor successfully completed trial plan payments. See Final Modification Agreement attached as "Exhibit A."
3. The incurring of this loan modification is beneficial to all parties in this case in that it will allow LoanCare, LLC to receive the necessary payments to complete the loan while allowing the debtors to retain their property without facing further financial strain by reducing both the payment and the interest rate.
4. The debtors have continued to comply with the terms of the Chapter 13 Plan.

5. A Motion to Modify the Chapter 13 Plan will follow the filing of this Motion to adjust for changes to the Chapter 13 plan as a result of the Final Modification.

WHEREFORE, Debtor, by and through the undersigned Counsel respectfully requests this Honorable Court to enter an Order Granting the Loan Modification regarding the mortgage on the property located at 309 Crescent Hill Drive Havertown, PA 19083.

Dated: August 27, 2021

/s/Brad J. Sadek, Esq
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